

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

NEIL EICHMAN, AS PERSONAL	)	Civil Action No.: 2:20-04057-BHH
REPRESENTATIVE OF THE ESTATE OF	)	
MEGAN R. EICHMAN	)	
	)	
Plaintiff,	)	<b>PLAINTIFF'S DISCLOSURE OF</b>
	)	<b>PROPOSED PRESENTATION OF</b>
v.	)	<b>RECORDS CUSTODIAN</b>
	)	<b>WITNESSES BY AFFIDAVIT</b>
AUSTIN RISSANEN, in his individual	)	
capacity; CHARLESTON COUNTY	)	
SHERIFF'S OFFICE; and TOWN OF	)	
JAMES ISLAND,	)	
	)	
Defendants.	)	

Pursuant to the Fourth Amended Consent Scheduling Order, Plaintiff proposes the following records custodian witnesses to be presented by affidavit at trial. Counsel for Plaintiff certifies that the affidavits of records custodian witnesses and the complete copies of the records received from each records custodian have been produced to Defendants through counsel.

1. Affidavit of Christopher B. Brumlow South Carolina Criminal Justice Academy for the 13 pages kept, maintained and produced pursuant to Plaintiff's subpoena served on February 12, 2021.
2. Affidavit of Christina N. Denson, Summerville Police Department for the 204 pages kept, maintained and produced pursuant to Plaintiff's subpoena served on February 12, 2021.

Plaintiff reserves the right to supplement this disclosure through a joint stipulation of authenticity among the parties.

Respectfully submitted,

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April 5, 2022  
Charleston, South Carolina